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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

THE BOEING COMPANY, Plaintiff, v. MAZIAR MOVASSAGHI, in his official capacity as the Acting Director of the California Department of Toxic Substances Control, Defendant.	Case No. 09-CV-03165-GEB-GGH DECLARATION OF RICK BRAUSCH IN SUPPORT OF DEFENDANT'S REPLY MEMORANDUM RE ORDER TO SHOW CAUSE FOR TRANSFER OF VENUE Date: June 21, 2010 Time: 9:00 a.m. Courtroom of the Honorable Garland E. Burrell, Jr., United States District Judge

I, Rick Brausch, declare as follows:

1. I am over eighteen (18) years of age, and I am fully competent to make this declaration. I make this declaration based on my own personal knowledge and on knowledge that I have gained through my professional responsibilities. The facts stated herein are all true and correct, and if called to testify, I would and could competently testify as set forth below.

2. I am currently employed as the Legislative and Policy Director at the California Department of Toxic Substances Control (Department). I am also currently the lead negotiator

for DTSC with the Boeing Company and other responsible parties over the cleanup at the Santa Susana Field Laboratory.

3. On June 9, 2010, I performed an internet search for articles relating to the "Santa Susana Field Laboratory" in three different newspapers: the Ventura County Star, the Los Angeles Daily News (a San Fernando Valley newspaper), and the Sacramento Bee.

4. The internet search yielded these results. Between October 2006 and May 2010, there were approximately 130 articles relating to the contamination, cleanup and negotiations concerning the Santa Susana Field Laboratory that appeared in the Ventura County Star. During a recent, but shorter, time period, between July 2009 and May 2010, there were 10 articles on the contamination, cleanup and negotiations concerning the Santa Susana Field Laboratory that appeared in the Los Angeles Daily News. My search of articles relating to the Santa Susana Field Laboratory in the Sacramento Bee yielded no results whatsover.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Sacramento, California this 14th day of June, 2010.

/s/ Rick Brausch
RICK BRAUSCH